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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 DIEGO M. GALIETTI, an individual,

16 Plaintiff,

17 vs.

18 WESTERN PROGRESSIVE-NEVADA, INC.,
19 and DOES I THROUGH X inclusive; and ROE
20 CORPORATION XX through XXX, inclusive,

21 Defendants.

Case No.: 2:21-cv-2034-APG BNW

**JOINT MOTION TO EXTEND
DEADLINE TO FILE SUPPLEMENTAL
BRIEFING (FIRST REQUEST)**

22 Plaintiff, Diego M. Galietti (“Plaintiff”), and Defendant, Western Progressive-Nevada, Inc.
23 (“Western Progressive”) (collectively “Parties”), by and through their counsel of record, hereby
24 stipulate and agree as follows:

25 On December 21, 2021, an Order Granting Plaintiff’s Preliminary Injunction was filed
26 [ECF No. 19]. Western Progressive is ordered to file a supplemental brief by February 1, 2022.
27 The deadline for Plaintiff to file a responsive brief is February 16, 2022. The Parties have discussed
28 extending the deadlines for supplemental briefing to allow for better investigation of the
allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Western
Progressive to file their supplemental brief to February 15, 2022.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Plaintiff to
file his responsive brief to March 1, 2022.

1 This is the first motion for an extension of time for the Parties to file their supplemental
2 briefing. The extension is requested in good faith and is not for purposes of delay or prejudice to
3 any other party.

4 DATED this 25th day of January, 2022.

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6 WRIGHT, FINLAY & ZAK, LLP

LAW OFFICE OF RANDAL R.
LEONARD, ESQ.

7 /s/ Ramir M. Hernandez

/s/ Randal R. Leonard

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15 IT IS SO ORDERED:

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18 UNITED STATES DISTRICT JUDGE

19 DATED: January 28, 2022
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